## NJID 792238

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PARTICIPATION TRUST

## UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY

IN RE: : CHAPTER 11

ANTHONY OTTILIO A/K/A

ANTHONY V. OTTILIO : CASE NO. 17-15942-MBK

: NOTICE OF MOTION FOR

Debtor(s) : **RELIEF FROM** 

: STAY

ANTHONY OTTILIO A/K/A ANTHONY V. OTTILIO 511 PASSAIC AVENUE SPRING LAKE, NJ 07762 KENNETH J. ROSELLINI, ESQUIRE 636A VAN HOUTEN AVENUE CLIFTON, NJ 07013

ANDREA DOBIN TRENK DIPASQUALE 427 RIVERVIEW PLAZA TRENTON, NJ 08611

U.S TRUSTEE

US DEPT OF JUSTICE

OFFICE OF THE US TRUSTEE ONE NEWARK CENTER STE 2100

NEWARK, NJ 07102

MICHELE M. DUDAS

TRENK, DIPASQUALE, DELLA FERA &

**SODONO** 

347 MT. PLEASANT AVENUE

**SUITE 300** 

WEST ORANGE, NJ 07052

**BENJAMIN TEICH** OFFICE OF THE UNITED STATES TRUSTEE ONE NEWARK CENTER **SUITE 2100** NEWARK, NJ 07102

PLEASE TAKE NOTICE that on 11/06/2017, at 10:00 AM or as soon as counsel may be heard, the undersigned attorney for the secured creditor will move before the United States Bankruptcy Court, TRENTON, NJ 08608, New Jersey for an Order Vacating the Automatic Stay, with respect to property located at 511 PASSAIC AVENUE, SPRING LAKE, NJ 07762 and allowing the Attorney for U.S. BANK TRUST, N.A., AS TRUSTEE FOR LSF8 MASTER PARTICIPATION TRUST to proceed with contractual remedies or other remedies that may be available under state law.

PLEASE TAKE FURTHER NOTICE, that in support of the within Motion, the Movant will rely upon the Certification in Support and the proposed Order submitted herewith, as well as, oral arguments, if necessary. Pursuant to D.N.J. LBR 9013-2, Movant states that no brief or memorandum of law is necessary because of the absence of novel or complex questions of law. However, if responsive papers are filed in opposition to the Motion, the Movant reserves the right to respond to any issues of law raised therein in the form of a brief or a memorandum of law.

Dated: September 20, 2017

/s/ James P. Shay James P. Shay, Esq. Phelan Hallinan Diamond & Jones, PC 400 Fellowship Road, Suite 100 Mt. Laurel, NJ 08054

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